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**KERR-McGEE CHEMICAL CORPORATION**

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

February 12, 1999

Mr. Ralph Dollhopf, On-Scene Coordinator  
United States Environmental Protection Agency  
Region V, Waste Management Division  
Emergency and Enforcement Response Branch  
9311 Groh Road  
Grosse Ile, Michigan 48138

RE: Amendments to the Time Critical Removal Plan for Toledo Tie Treatment Site  
KMC001.100.0040

Dear Mr. Dollhopf:

As we discussed on January 26, 1999, Kerr-McGee Chemical, LLC (KMC) is preparing to install engineering controls to address infiltration into the Arco Drive and Frenchmens Road storm sewer systems and the seepage of creosote from the banks and bottom of Williams Ditch. These conditions were not previously apparent and were encountered during the implementation of the time critical removal at the Toledo Tie Treatment Site. As required in the Unilateral Administrative Order, KMC is requesting an amendment to the work plan. Below is a description of the proposed changes to the Time Critical Removal Plan for the Toledo Tie Treatment Site (HAI document No. PWM001.100.0063).

#### Storm Sewer Systems for Arco Drive and Frenchmens Road

While installing the ditch bypass system, free product was observed flowing into the upstream limits of the sediment management area through the 48" culvert under Arco Drive. The source of this material was traced to the 36" storm sewer that services Arco Drive south of Williams Ditch. The storm sewer systems servicing Arco Drive and Frenchmens Road were cleaned and videotaped. While viewing this footage, field personnel observed that some sections in both storm sewer systems had infiltration of free product at the storm sewer joints and ungrouted pick up holes.

After evaluating several options to address this potential migration pathway, KMC intends to slipline the Arco Drive and half of the Frenchmens Road storm sewer systems with HDPE pipe. In addition, KMC will replace the half of the Frenchmens Road storm sewer system that has already been removed using HDPE pipe instead of reinforced concrete pipe. The attached drawings illustrate which pipes will be sliplined and which pipes will be replaced with HDPE pipes.

#### Seepage of Free Product into Williams Ditch

During our meeting on January 26, 1999, we discussed seepage that was observed along the north and west banks of Williams Ditch near the LBA building. A few days after our meeting, while continuing the sediment removal process, seeps/pockets of product were observed on the north and south banks of Williams Ditch near the Radco building. The attached figure indicates the general area where seeps/pockets of free product have been observed to date.

Initially, approximately six inches of soil were scraped off the banks in the area where seeps were observed. Although this removed the original seeps, some new seeps were exposed. In order to investigate the location of the seep materials, a truck mounted Geoprobe® was used to install soil borings within the LBA and Pepsi

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parking lots. Due to insufficient access, soil borings were not collected between the eastern side of the LBA building and the ditch bank. Based on these soil borings, it was determined that the seeps/pockets of product extended into the LBA parking lot. The soil borings within the Pepsi parking lot did not contain any sources of free product and thus indicate that the seeps/pockets do not extend under Pepsi's parking lot.

In addition, a test pit was excavated on the south side of the ditch approximately twenty feet south of the area where the seeps were observed on the south bank of Williams Ditch. No evidence of contamination (i.e. staining or product) was observed during the excavation of the test pit south of Williams Ditch.

After evaluating several options, KMC intends to use a combination of three engineering controls. They consist of:

1. Enclosing Williams Ditch with two 48" HDPE pipes from Arco Drive to the second 90 degree bend in Williams Ditch
2. Lining Williams Ditch with a flexible membrane liner system including a compacted clay subgrade, protective cover soil, and erosion protection from the endwall of the two 48" HDPE pipes to downstream of any observed seepage
3. Install a gravel drainage system beneath the HDPE pipes and flexible membrane liner system including collection points to remove any free product that may migrate to the drainage system

The attached drawing illustrates which sections will be enclosed and which sections will be lined. KMC believes that this combination of engineering controls will prevent the waters of Williams Ditch from coming in contact with any contamination that may exist outside of the original excavation limits. Any remaining contamination will be investigated and addressed during the Engineering Evaluation/Cost Analysis that will be performed for this site. As a result, KMC does not intend to change the boundaries of the excavation limits indicated on the plan set dated September 1998.

Due to the recent discovery of additional seeps (described above), design documents for these changes are still being developed. Once completed, pertinent design information will be submitted under separate cover. If you have any questions or concerns regarding these proposed changes, please contact me at (405) 447-8300.

Sincerely,



Peter Goetz  
Project Coordinator

cc: A. Keith Watson, Kerr-McGee Chemical, LLC  
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